MO Gen 109

MISSOURI DEPARTMENT OF NATURAL RESOURCES
P.O. Box 1368 1915 Southridge Drive Jefferson City, Missouri 65102 (314) 751-3241

September 1, 1982

LOW-82.1.017

Mr. Dick Eaton
Branch Manager
Safety-Kleen Corporation
1227 Hanley Industrial Center
Brentwood, MO 63144

Dear Mr. Eaton:

Enclosed please find a copy of the Resource Conservation and Recovery Act Compliance Inspection Report for your facility. I believe it is self-explanatory.

Recommendations number 1 and 2 must be completed by October 3, 1982. By this date please send documentation both confirming and demonstrating compliance to Mr. Paul Meiburger of this office and the St. Louis Regional Office. To comply with recommendation number 3, by November 8, 1982 engineering plans for the leak detection system must be submitted to Mr. Paul Meiburger and the St. Louis Regional Office for approval.

If you have any questions or if we can be of assistance to you, don't hesitate to contact either the regional office or Mr. Paul Meiburger of this office.

Sincerely,

David E. Bedan

David E. Bedan, Ph.D.
Director
Waste Management Program

DEB/PM/bki

Enclosures

cc: St. Louis Regional Office
U.S. EPA Region VII Enforcement Branch
Mr. Kelvey Hersey

MISSOURI DEPARTMENT OF NATURAL RESOURCES
8460 Watson Road St. Louis, Missouri 63119 (314) 849-1313

27.080
Safety-Kleen Corporation
August 17, 1982

RCRA COMPLIANCE INSPECTION REPORT

FACILITY

Safety-Kleen Corporation
1227 Hanley Industrial Center
Brentwood, Missouri 63144
(314) 961-0597

MO Generator ID: 03282
EPA ID: MOD096714829

INTRODUCTION

An inspection of the Safety-Kleen Corporation Brentwood facility was conducted on June 16, 1982 to assess compliance with applicable federal and state regulations, pursuant to the Resource Conservation and Recovery Act and the Missouri Hazardous Waste Management Law. Mike Duvall of the St. Louis Regional Office represented the Missouri Department of Natural Resources (MO DNR). Mr. Dick Eaton, Branch Manager, represented the company and accompanied the inspector throughout the plant visit.

Safety-Kleen is a distributor and servicer of solvent type cleaning products and equipment for use by various commercial and industrial customers. The Brentwood facility is one of some 180 similar branch locations in 47 states. These branch operations collect and temporarily store spent solvents considered to be hazardous waste following customer usage.

The investigation on June 16, 1982 consisted of a meeting to review regulatory requirements as well as company records and waste management procedures, followed by a physical inspection of the waste storage areas.

UNSATISFACTORY FEATURES

1. Continuing training is not provided for employees.

2. No formal agreements have been made with emergency response agencies.

3. No leak detection system has been provided for the underground storage tanks.

DISCUSSION

Safety-Kleen has a unique role in the hazardous waste management business, with respect to solvent recovery and reuse. The company operates a closed-loop system whereby clean solvents are distributed for customer use, and the dirty (spent) material is reclaimed and used again in the same manner. To accomplish this, a branch facility such as the Brentwood terminal is set up to service a certain geographical region. The terminal distributes clean product, along with equipment for its proper

usage, to numerous customers. The spent product is returned at regular intervals to the terminal for interim storage prior to shipment for reclamation at a resource recovery plant. Company personnel, equipment and transport vehicles handle the material at all points in this sequence other than the actual usage phase at the various customer sites. The material is considered at all times by the company as its property, and the usage is therefore considered a rental arrangement.

Two distinct types of solvent product are designated and marketed by the company at the Brentwood facility. The description and management sequence for each of these is as follows:

1) Trade Name - Safety-Kleen 105 Solvent.

   This is reportedly a petroleum naptha composition solvent also termed mineral spirits.

   16 and 30 gallon capacity drums are filled with this product, installed on portable washer units and shipped out for use.

   The units are delivered to industrial and commercial customers for small to medium volume parts degreasing operations.

   The units are picked-up on regular service intervals and returned to the terminal. Here the drums are disconnected and off-loaded onto a platform. The spent solvent contents are poured into a converted refuse dumpster which drains through a filter to two underground holding tanks located under an asphalt driveway/delivery area behind the terminal building. The dumpster's filter initially screens some of the sludge, which is periodically removed and put into drums.

   The empty drums are temporarily stored within the main building and are subsequently refilled with clean product for redistribution and completion of the circuit.

   A tanker truck with a 6500 gallon capacity provides the link between the terminal and the resource recovery plant, an authorized facility in Elgin, Illinois. Incoming recycled product is transferred to either of two underground holding tanks, rated at 8000 and 10,000 gallon capacities. After effecting this transfer, the spent solvent from the other two tanks (6000 and 10,000 gallons respectively), is pumped into the tanker vehicle and returned to the Elgin facility for reclamation.

2) Trade Name - Safety Kleen Immersion Cleaner Solvent

This is reportedly a 2-phase product consisting of an upper moderately alkaline aqueous layer, and a lower layer comprised of chlorinated solvent, sodium soap of tall oil, and cresylic acids.

30 gallon drums filled with this product are delivered to small commercial customers, primarily automotive repair garages and service stations, for cleaning carburetors.

Drums of spent product are replaced with drums of clean product at the customer premises on a regular basis by company staff..

The drums of spent product are stored at the Brentwood facility until transport is available for their return to Elgin for reclamation.

Flat bed or closed body transport vehicles deliver clean product to the Brentwood facility and return the drums of spent product to Elgin for reclamation. At the same time drums of sludge from the handling of #1 (Safety-Kleen 105) are also picked up and returned to the recovery plant.

During the inspection on June 16, 1982 a transport-transfer event was observed for solvent #1. This activity, as well as all other observable aspects of the terminal operation, appeared to be conducted in a well-run manner.

Safety-Kleen is registered with the MO DNR as a generator of hazardous wastes at the Brentwood facility, corresponding with the spent solvents accumulated there at any point in time. Turnaround time for any given batch of spent material is reported to be approximately 3 weeks, or well below the 90-day storage criteria defined in the regulations.

The MO DNR concurs with the interpretation that generator status is the appropriate designation for the branch terminals with the waste reclamation facility (the Elgin, Illinois facility) having the TSD designation. It was confirmed during the inspection that company staff are using manifests in the manner applicable to their closed-loop system; specifically, the terminal signs off as generator, with the company driver as transporter and the Elgin facility finally as the TSD.

The company originally filed with the U.S.EPA for interim status as a TSD facility for the Brentwood branch. In a discussion with corporate staff however, the inspector was advised that Safety-Kleen subsequently was notified by EPA in a letter dated July of 1981 that a determination had been made to exempt the branch operations from TSD requirements.

After reviewing federal interim status requirements applicable to generators with Mr. Eaton, two areas needing improvement were identified as referenced in the UNSATISFACTORY FEATURES section These requirements are found in 40 CFR 265.16 (d) and 265.52 (c).

The state regulation for waste storage periods under 90 days includes requirements for underground tanks. In order to satisfy these requirements, a leak detection system must be provided for the solvent storage tanks. The appropriate reference on this matter can be found in 10 CSR 25-7.050(2)(A)4 and (4)(A)3.

RECOMMENDATIONS:

1. Maintain a written description of the hazardous waste management continuing training needed for employees at the Brentwood operation.

2. Provide a detailed description of formal agreements between the Brentwood facility and emergency response agencies such as the local fire department.

3. Provide a leak detection system for the tanks.

Should you have any questions concerning this report, please contact Mike Duvall of the St. Louis Regional Office at (314) 849-1313.

APPROVED:

F. Donald Maddox, P.E.
Regional Administrator
St. Louis Regional Office

PREPARED BY:

Mike Duvall
Chief - Waste Management
St. Louis Regional Office

FDM/MD/bkl

Enclosure

RCRA CHECKLIST FOR INSPECTION OF GENERATORS

Name of Facility: Safety-Kleen Corp.

Address: 1227 Hanley Ind. Court
Brentwood, MO 63144

EPA Generator ID Number: MO D096714829

Facility Inspection Representative: Dick Eaton

Title: Branch Manager

Telephone Number: 314 961 0597

RO USE

Inspection file No. _____

Reviewer _____

Date reviewed: _____

Form "A"

Pert. Regs. 40 C.F.R. Part:

1. Please provide a brief narrative explaining the type of work activity that occurs at the generator.

Distribution/collection center for solvent cleaner products and equipment rented to customers on a contract basis.

2. Does the generator dispose of its wastes....

A. On-site

(B.) Off-site

(Circle one or both)

Note: if on-site, then checklist for both a generator and TSD facility must be completed if on-site more than 90 days.

3. What is the amount of hazardous waste (in kilograms) produced by the generator facility in a month? 3400 in a year? 40 900
(If the amount is less than 1,000 kg/month, then the facility qualifies as a small generator and Form C should be completed instead of Form A.)

4. What categories of hazardous wastes result from the generator's facility? Please circle:

A. Ignitable wastes	(Yes)	No
B. Reactive wastes	Yes	(No)
C. Corrosive wastes	Yes	(No)
D. EP Toxic wastes	(Yes)	No
E. RCRA Listed Waste	(Y)	

262.12	5. Is the generator presently...	Circle one
	A. Treating hazardous waste?	Yes (No)
	B. Storing hazardous waste? > < 90 days	Yes (No)
	C. Disposing hazardous waste?	Yes (No)
	Note: if the generator performs any of the activities noted in Question 5, then the inspector must complete Form B, entitled "RCRA Checklist for inspection of hazardous waste treatment, storage and disposal facilities."	
262.20	6. Is a manifest system currently in operation at the generator's facility so that offsite shipment of hazardous wastes can be tracked?	(Yes) No
	7. Please inspect the generator's manifest for the following information:	
	A. Is the TSD facility which receives a generator's hazardous waste identified by name, address, and EPA ID number?	(Yes) No
262.20(c)	B. Is an alternative facility designated in case of an emergency? optional	Yes (No)
	C Is a serialized manifest document number included on the form?	(Yes) No
262.20(a)(2)	D Is the generator's name, address, telephone number and EPA ID number included on the form?	(Yes) No
262.20(a)(3)	E. Is the name and identification number of each transporter included on the form?	(Yes) No
	F. Is a description of the generator's hazardous waste to be treated, stored, or disposed included on the manifest?	(Yes) No
	G. Is the quantity of each waste by units of weight or volume and the type and number of containers loaded in the transport vehicle included on the manifest form?	(Yes) No
	H. Is the following certification noted on the generator's manifest form and is the certification acknowledged by the generator's signature? "This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the available regulations of the DOT and EPA."	(Yes) No
262.22	I. Are there adequate copies of the manifest available for generator, transporter, and TSD's?	(Yes) No
	8. Is hazardous waste being stored on-site by the generator for less than 90 days?	(Yes) No
	If so,	
262.34(a)(3)	A. Is the date accumulation of waste began clearly marked on each storage container?	Yes (No)

262.34(a)(2)	B. Are storage containers in good condition, i.e., no corrosion, leaking, or structural deformations?	(Yes)	No
262.34(a)(4)	C. At the time of accumulation, are the storage containers clearly labeled as containing a particular hazardous waste in accordance with DOT regulations?	(Yes)	No
	9. Does the generator have an established contingency plan to deal with emergencies that may impact hazardous waste currently in storage at the facility?	(Yes)	No
265.16(a)	10. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?	(Yes)	No
265.16(d)	11. Does the generator facility maintain a record of job titles for personnel that are involved with hazardous waste management and the name of the employee filling each job?	(Yes)	No
265.16(d)(2)	12. Does the generator facility have on record a written position description for each job title noted in Question #11?	(Yes) ?	No
265.16(d)(3)	13. Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees noted in Question #11?	Yes	(No)
265.32(a)	14. *Does the generator facility have installed the following equipment:		
	A. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion?	(Yes)	No
	B. A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from Police, Fire departments, etc.?	(Yes)	No
	C. Fire control equipment and an adequate supply of fire fighting water or fire supression chemicals?	(Yes)	No
265.35	15. *Does the generator facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies?	(Yes)	No
265.50	16. Does the facility have a contingency plan which contains the following elements:		
265.52(c)	A. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water?	(Yes)	No
265.52(d)	B. A detailed description of arrangements formally agreed to by local police, fire departments, and State and local emergency teams to provide assistance during emergency situations?	Yes	(No)

265.52(d) C. A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators? (Yes) No

Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis.

265.52(e) D. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? Yes (No)

265.52(f) E. *An evacuation plan for the generator facility if Management believes such a plan is a definite requirement for their particular generator facility. N/A Yes No

17. Please provide detailed comments on specific problems encountered during the inspection For instance, industry requests for clarification of specific RCRA rules and regulations and their applicability at the facility can be noted below or described in a separate memo attached to the inspector's checklist.

Inspector's Name: Mike Darnall

Title: Env. Spec.

Agency: MO DNR

Office location: St. Louis Reg.

Date of Inspection: 6-16-82

Inspector's Name: _____

Title: _____

Agency: _____

Office location: _____

Date of Inspection: _____

A Checklist for Use [redacted] Management of Containers

rt I Section 265.170 - "General Operating Requirements"

R.O. USE

Inspection file No:

Reviewer:

Date Reviewed:

Form "I"

cility: Safety-Kleen

enerator ID Number: MADO96714829

ity Inspection Representative:

:

ione Number:

estions contained in this checklist apply to owners and operators of all hazardous waste ties that store containers of hazardous waste, except as Section 265.1 provides otherwise.

Regs. .R.			
	1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?	(Yes)	No
	2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes?	(Yes)	No
(a)	3. Are all containers holding hazardous waste kept closed during storage?	(Yes)	No
	4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week?	(Yes)	No
1) b)	5. Is an inspection log maintained? (See question #5 of TSD checklist.)	Yes	(No)
	6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line?	(Yes)	No
(a)	7. Are incompatible wastes placed in the same container? (See Appendix 5 for examples.)	Yes	(No)
(c)	8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, wails, or other devices?	(Yes)	No

Form "1"

ctor's Name: MD

:

y: MO DNR

e location: SLRO

of Inspection: 6-16-82

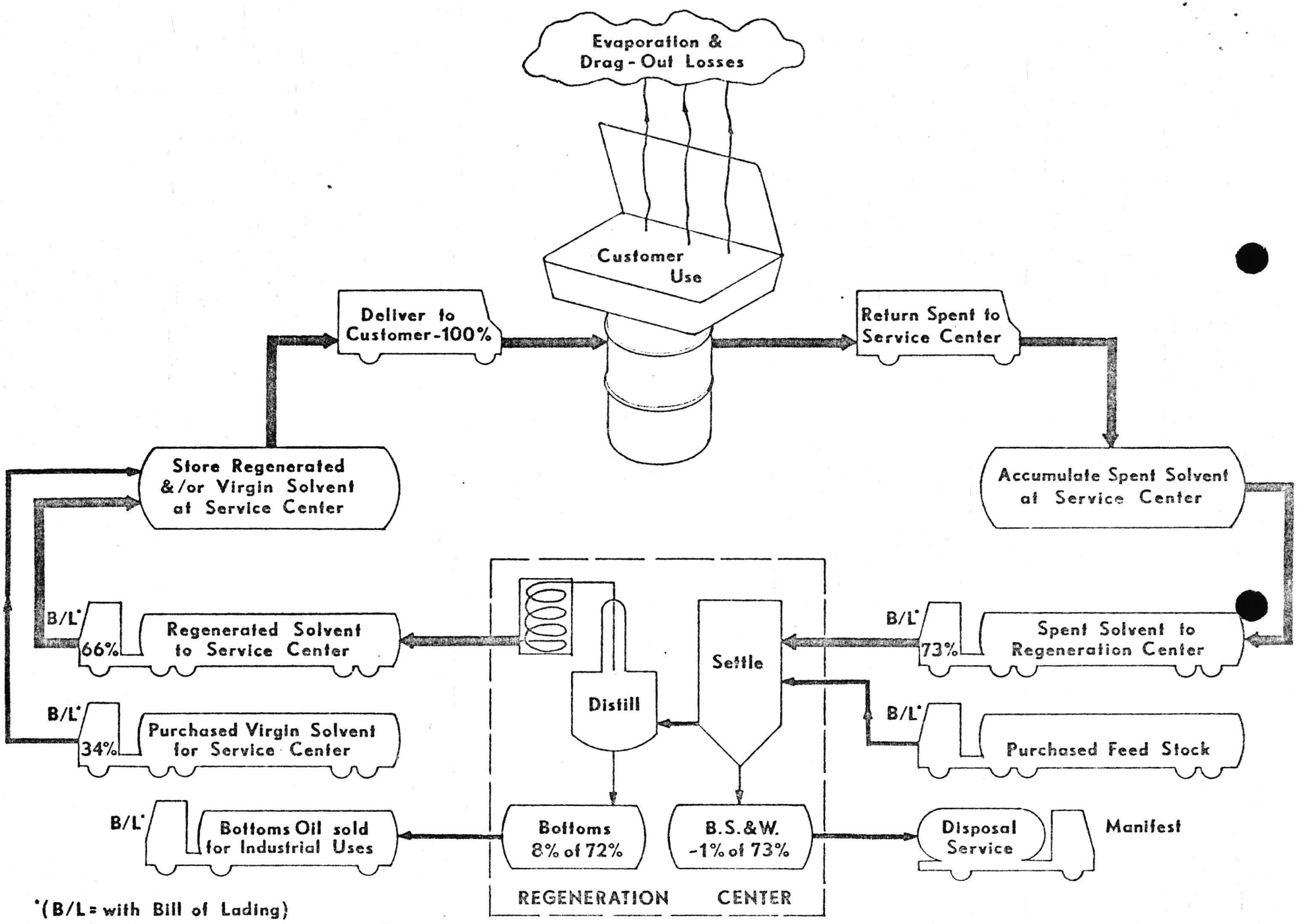
ctor's Name:

:

y:

e location:

of Inspection:


Evaporation &
Drag - Out Losses
Customer
Use
Deliver to
Customer-100%
Return Spent to
Service Center
Store Regenerated
&/or Virgin Solvent
at Service Center
Accumulate Spent Solvent
at Service Center
B/L*
66%
Regenerated Solvent
to Service Center
B/L*
34%
Purchased Virgin Solvent
for Service Center
B/L*
73%
Spent Solvent to
Regeneration Center
B/L*
Purchased Feed Stock
Settle
Distill
B/L*
Bottoms Oil sold
for Industrial Uses
Bottoms
8% of 72%
B.S.&W.
-1% of 73%
Disposal
Service
Manifest
REGENERATION CENTER
*(B/L = with Bill of Lading)